

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KATHRYN M. LAKEBERG,)	
)	
Plaintiff,)	No. 07CV7095
)	
v.)	Judge Milton I. Shadur
)	
UNITED PARCEL SERVICE,)	Magistrate Judge Susan E. Cox
)	
Defendant.)	

**DEFENDANT’S UNCONTESTED MOTION FOR ADDITIONAL TIME
TO ANSWER OR OTHERWISE PLEAD AND TO RESET STATUS HEARING DATE**

Defendant United Parcel Service (“UPS”) moves this Court for an additional thirty (30) days to answer or otherwise plead in response to the Complaint filed by Plaintiff Kathryn Lakeberg (“Lakeberg” or “Plaintiff”) in this matter. In support of this motion, UPS states as follows:

1. Plaintiff filed her Complaint on December 18, 2007.
2. UPS’s registered agent was served on March 3, 2008. UPS’s responsive pleading is due March 23, 2008.
3. UPS needs an additional thirty (30) days – that is, until April 22, 2008 – to investigate the allegations in the Complaint in order to respond in good faith.
4. This is UPS’s first request for additional time in this matter, and Plaintiff will not suffer prejudice as a result of this extension.
5. UPS also requests that the Court strike the status hearing date set for April 7, 2008, and reset the hearing for a date after April 22, 2007.

6. Plaintiff informed UPS's counsel, Meghan E. Riley, on March 7, 2008, that she had no objection to this Motion.

WHEREFORE, Defendant United Parcel Service requests that this Court enter an Order granting it an additional thirty (30) days – until April 22, 2008 – to answer or otherwise plead in response to Plaintiff's Complaint and reset the April 7, 2008 status hearing date to a date after April 22, 2008.

DATED: March 13, 2008

Respectfully submitted,

UNITED PARCEL SERVICE

By: /s/ Meghan E. Riley
One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on March 13, 2008, a copy of the foregoing DEFENDANT'S UNCONTESTED MOTION FOR ADDITIONAL TIME TO ANSWER OR OTHERWISE PLEAD AND TO RESET STATUS HEARING DATE was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system.

The undersigned also certifies that she served a true and correct copy of the foregoing DEFENDANT'S UNCONTESTED MOTION FOR ADDITIONAL TIME TO ANSWER OR OTHERWISE PLEAD AND TO RESET STATUS HEARING DATE upon:

Kathryn M. Lakeberg
4909 Cross Street
Downers Grove, IL 60515

by placing same in the U.S. Mail at 500 West Madison Street, Chicago, Illinois 60661, properly addressed and first class postage prepaid, before 5:00 p.m. on March 13, 2008.

/s/ Meghan E. Riley